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**VIA ECF**

March 31, 2015

The Honorable Leonard P. Stark  
United States District Court of Delaware  
844 N. King Street  
Wilmington, DE 19801

Re: ***Princeton Digital Image Corp. v. Dell, Inc.*** Civ. No. 13-238-LPS

Dear Chief Judge Stark:

We write to provide subsequent authority, in accordance with D. Del. LR 7.1.2(b), for Defendant Dell Inc.'s ("Dell") letter brief in support of Dell's Motion for Leave to Amend Answer. *See* D.I. 67 and 68. Plaintiff Princeton Digital Image Corporation ("PDIC") has opposed Dell's motion. *See* D.I. 74. Dell's proposed Amended Answer includes information regarding PDIC's patent license agreement with the Microsoft Corporation for Dell's affirmative defense of license and breach of contract counterclaim. In PDIC's litigation with the Hewlett-Packard Company ("HP") in the U.S. District Court for the Southern District of New York, HP filed a motion for summary judgment of noninfringement based on PDIC's license agreement with Microsoft.<sup>1</sup> On March 26, 2015, Judge Sullivan in the S.D.N.Y. issued an opinion granting HP's motion for summary judgment. *See Princeton Digital Image Corp. v. Hewlett Packard Co., et al.*, Case No. 1:12-cv-779 (S.D.N.Y.), at D.I. 479 (attached hereto as Ex. D). This opinion discusses PDIC's agreement with Microsoft at length and interprets many provisions of the agreement. Accordingly, Dell submits the attached opinion to the Court as relevant to Dell's letter brief and accompanying Motion for Leave to Amend Answer.

Counsel for Dell is available at the Court's convenience should Your Honor have any questions.

Respectfully,

A handwritten signature in blue ink that reads "Francis DiGiovanni".

Francis DiGiovanni

FD/cr

cc: Clerk of the Court (via ECF)  
Counsel of Record (via ECF)

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<sup>1</sup> PDIC's litigation with HP involves the same patent asserted against Dell, U.S. Patent No. 4,813,056.